9. *Significant Irreversible Changes Due to the Proposed Project*

Section 15126.2(c) of the CEQA Guidelines requires that this DSEIR describe any significant irreversible environmental changes that would be caused by the SBRA Project should it be implemented. The OSA Site 1, as analyzed in the OSA PEIR, included the development of 2,815 residential dwelling units and 320,000 square feet of commercial uses. Development of OSA Site 1 would allow construction activities that would entail the commitment of nonrenewable and/or slowly renewable energy resources; human resources; and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metal, and water. An increased commitment of social services and public maintenance services (e.g., police, fire, schools, libraries, sewer, water, solid waste, and natural gas services) would also be required. Energy and social service commitments would be long-term obligations.

The OSA PEIR identified the following irreversible changes arising from development of OSA Site 1. The development of the project site was determined to be a long-term irreversible commitment of the use of land. After the 50- to 75-year structural lifespan of new building construction is reached, it is improbable that the project site would revert to its current condition due to the large capital investment that would already have been committed. The following lists the significant irreversible changes that are likely to result from implementation of OSA Site 1:

- Development would result in the continued commitment of the majority of the project site to urban development, thereby precluding any other uses for the lifespan of the Project. Restoration of the site to pre-developed conditions would not be feasible given the degree of disturbance, the urbanization of the area, and the level of capital investment in the area.

- Resources that will be permanently and continually consumed by implementation of OSA Site 1 include water, electricity, natural gas, and fossil fuels. However, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources. With respect to operational activities, compliance with all applicable building codes, as well as mitigation measures, planning policies, and standard conservation features, would ensure that all natural resources are conserved to the maximum extent possible. It is also possible that new technologies or systems will emerge, or will become more cost-effective or user-friendly, to further reduce the reliance upon nonrenewable natural resources. Nonetheless, construction activities related to the SBRA Project would result in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment.

- Implementation of OSA Site 1 would result in the reduction of natural vegetation and wildlife communities; alteration of the visual character of the site; increased generation of pollutants; and the short-term commitment of non-renewable and/or slowly renewable natural and energy resources, such as lumber and other forest products, mineral resources, and water resources during construction activities. As previously discussed, operations associated with future uses would also consume natural gas and electrical energy. While many of these impacts can be avoided, lessened, or mitigated, some of these impacts are irreversible consequences of urban growth.

- As required by the City's building code, build out of OSA Site 1 would include lighting and other energy conservation measures, and would include construction of all structures with up-to-date energy-saving equipment. Lighting conservation efforts in new construction include installation of occupancy sensors to automatically turn off lights when not in use, lighting reflectors, electronic ballasts, and energy-efficient lamps. Conservation efforts would also be expected to involve improved HVAC systems with microprocessor controlled energy management systems. In addition, all development would be required to comply with specifications contained in Table 24 of the California Code of Regulations (CCR).

The SBRA Project, which is a refinement of the project scenario analyzed for OSA Site 1, would include 2,379 residential units and 25,000 square feet of commercial uses. The SBRA Project represents a reduction in development intensity of 436 residential units and 295,000 square feet of commercial uses. Although the development scenario is reduced, development of the SBRA Project would have a low likelihood that the land would revert back to existing uses. Therefore, development of the SBRA Project would generally commit future generations to these environmental changes. The significant irreversible changes listed above were contemplated in the OSA PEIR for the development of the SBRA Project and remain unchanged.

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the SBRA Project. While the Project would result in the use, transport, storage, and disposal of hazardous wastes, all activities would comply with applicable state and federal laws related to hazardous materials, which significantly reduces the likelihood and severity of accidents that could result in irreversible environmental damage.